

Appl. No. 09 942,601
Amdt. Dated October 6, 2003
Reply to Office action of June 4, 2003

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REMARKS/ARGUMENTS

1. In response to the clarity objection raised in respect of claim 5, the Applicant has sought to amend claim 5 to replace "*lowermost*" with "*lower most*" as suggested by the Examiner.

2. The Examiner has raised a 35 U.S.C. 112 enablement objection to claim 5 on the grounds that the written description fails to adequately disclose the feature of a "*roller feed mechanism that is configured to be engageable with a lower most sheet of media in the cartridge when the cartridge is positioned on the support structure.*" In reply, the applicant notes that Figure 3 is accompanied by the following description in the penultimate paragraph of page 5 of the specification:

"In this position, the primary feed roller 38 is positioned to engage the sheet 66 so that when the primary feed roller 38 rotates, the sheet 66 is drawn into the printing region 28."

The Applicant submits that it is clear from Figure 3 that sheet 66 is "*a lower most sheet of media*" and that "*primary feed roller 38*" is a "*roller feed mechanism.*" The Applicant submits that this section of the description would be understood by one of ordinary skill in the art to correspond to the feature described in claim 5.

3. The Examiner has raised an obviousness objection to claims 1 to 6 and 8 on the basis of McIntyre (US 6,149,256) and Kokubo (US 6,007,195). In reply, the Applicant submits that a number of the claimed features cannot be found in the citations and therefore the citations, either individually or in combination, do not anticipate the claims.

For example, the Examiner equates the claimed "*carrier*" with item 10 of McIntyre. Item 10 corresponds to McIntyre's "*insertable cartridge.*" The McIntyre cartridge contains ink reservoirs and paper, but does not have:

(a) "*a page width print head assembly that is mounted in the carrier*"; In McIntyre, the print head assembly (7) is outside the cartridge (10), as shown in Figure 8; or

(b) "*a media feed mechanism positioned in the carrier to feed media to and from the print head chip*"; In McIntyre, the media feed mechanisms (58 & 60) are outside the cartridge (10), as shown in Figure 8.

In addition, the McIntyre cartridge is not "*a carrier that is dimensioned to approximate a PCMCIA memory card.*" It is clear from Figures 6 and 7 that the McIntyre cartridge is much larger than a PCMCIA memory card.

The Examiner attempts to combine Kokubo with McIntyre in order to anticipate the claimed invention. However, the Kokubo arrangement does not disclose a carrier which has the dimensions of a PCMCIA memory card AND which is adapted to receive a media supply. In the Kokubo arrangement the scanning printer prints by being rolled across a page (see Fig. 2). It is therefore not designed to receive a media supply, as claimed.

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Similarly, the Kokubo arrangement does not disclose "*a media feed mechanism positioned in the carrier.*" Kokubo does not disclose a media feed mechanism at all, since it does not include a media receptacle from which media needs to be fed.

Furthermore, the Applicant notes that the Kokubo detachable printer is not inserted into "*an image recordal apparatus*" as claimed, but into a laptop PC. Accordingly, neither Kokubo nor McIntyre disclose:

"an image recordal apparatus that comprises a housing in which the carrier is received, the housing being dimensioned to define a sleeve for the carrier so that at least half the carrier is received in the housing"

The laptop computer of Kokubo is not an image recordal apparatus. The camera of McIntyre is an image recordal apparatus but it does not comprise a housing that is "*dimensioned to define a sleeve for the carrier so that at least half the carrier is received in the housing*" as claimed in claim 1.

For these reasons the Applicant submits that neither McIntyre nor Kokubo, either individually or in combination, describe all of the features of claim 1. Accordingly the Applicant submits that claim 1 is not obvious in light of these citations. Since the dependent claims add additional inventive features, they too are not obvious in light of the citations. The Examiner is requested to reconsider and withdraw his obviousness objections in light of these arguments.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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